

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION

IN RE:

CASE NO.: 22-40421-ELM -13

DIANNE LOUISE DORMAN
100 ASCOT DR
SOUTHLAKE, TX 76092
SSN/TIN: XXX-XX-0339

DEBTOR

HEARING: JUNE 2, 2022 AT 8:30 AM

TRUSTEE'S OBJECTION TO CONFIRMATION

TO THE HONORABLE U.S. BANKRUPTCY JUDGE:

NOW COMES Pam Bassel Standing Chapter 13 Trustee and files this Trustee's Objection to Confirmation. Trustee would respectfully show the Court:

The Plan fails to meet the disposable income test of 11 U.S.C. Section 1325 (b) (1) (B) because the Plan does not propose to pay all of the Debtor's disposable income for the applicable commitment period to the Debtor's unsecured creditors.

The Plan provides for an unsecured creditors' pool ("UCP") of \$0.00. The Trustee has calculated a UCP of \$89,545.80 based on a monthly disposable income of \$1,492.43 over a 60 month applicable commitment period, with the following add-backs, if any:

FORM 122C-2 LINE 22 NOT SUPPORTED ON SCHEDULE I OR J

500.00

The Plan does not meet the requirements of the best interests of creditors test of 11 U.S.C. Section 1325(a)(4). Debtor has equity in non-exempt property as follows:

CASH \$10.00

BANK ACCOUNTS \$205.00

SAVINGS ACCOUNT UNKNOWN VALUE

TXU DEPOSIT \$450.00

NE EQUITY HOMESTEAD \$14924.75

UNDISCLOSED CHECKING ACCOUNT & SAVINGS ACCOUNT WITH EECU

UNDISCLOSED CHECKING ACCOUNT & SAVINGS ACCOUNT WITH BANK OF TEXAS

UNDISCLOSED LAWSUIT WITH CITY OF SOUTHLAKE

UNDISCLOSED LAWSUIT WITH TEXAS A&M

The total equity in non-exempt property is unknown but the Plan provides for equity in non-exempt property of only \$15,589.75.

The Plan may not meet the requirements of the best interests of creditors test of 11 U.S.C. Section 1325(a)(4). Debtor may have non-exempt property with a value which has not yet been determined or disclosed.

The Debtor's Attorney's Fees exceed the court's guidelines for a "no-look" fee.

WHEREFORE, Trustee prays that confirmation be DENIED and for general relief.

Respectfully submitted,
By: /s/ Ethan S. Cartwright
Ethan S. Cartwright, Staff Attorney
Bar No. 24068273
PAM BASSEL STANDING CHAPTER 13 TRUSTEE
Bar No. 01344800
7001 Blvd 26, Ste 150
North Richland Hills, TX 76180
(817) 916-4710 Phone

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served on or before the date of filing. Service was accomplished electronically on Debtor's attorney and all parties entitled to electronic notice and by first class mail on the Debtor and the parties listed below, if any.

By: /s/ Ethan S. Cartwright
Ethan S. Cartwright

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SOUTHLAKE, TX 76092